

Immanuel J. Herrmann, *Pro Se*
Daniel A. Frishberg, *Pro Se*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
)	
CELSIUS NETWORK LLC, <i>et al.</i> ¹)	Case No. 22-10964 (MG)
)	
Debtors.)	(Jointly Administered)
)	

**OMNIBUS RESERVATION OF RIGHTS IN RESPONSE TO THE MOTION OF
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF
AN ORDER (I) ESTABLISHING PROCEDURES TO ESTIMATE THE
INTERCOMPANY CLAIM THAT CELSIUS NETWORK, LLC HAS AGAINST
CELSIUS NETWORK LIMITED AND (II) GRANTING RELATED RELIEF AND
THE SERIES B PREFERRED HOLDERS' MOTION FOR ENTRY OF AN
ORDER ESTABLISHING ESTIMATION PROCEDURE FOR THE
INTERCOMPANY CLAIM BETWEEN CELSIUS NETWORK LLC AND
CELSIUS NETWORK LIMITED IN FURTHERANCE OF FORMULATING THE
DEBTORS' PLAN OF REORGANIZATION**

Immanuel J. Herrmann and Daniel A. Frishberg, Celsius Network LLC, *et al.* creditors, hereby submit this omnibus reservation of rights in response to the UCC's and the Preferred Series B's inter-company claims estimation motions, D.R. 2369 and 2367 (collectively, the "the Motions"), and their proposed scheduling orders. We respectfully state as follows:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

RESERVATION OF RIGHTS

The Preferred Series B Shareholders have not met and conferred or informally discussed their Motion or proposed scheduling order with us, in spite of our request (copying Chambers). The Preferred Series B have, however, requested to brief the bellwether claims litigation.²

We reserve all rights with respect to the Intercompany Claims Motions, including the right to serve discovery (for avoidance of doubt, including serving fact and/or document discovery on the Preferred Series B Shareholders, in particular, those who attended Celsius Risk Committee meetings), to attend and/or notice depositions, to meet and confer on the Motions and any associated scheduling orders, and, if we so choose, to brief the Motions and to otherwise participate in all respects.

² Aaron Colodny, UCC Counsel: "I am also copying counsel to the preferred equity holders on this email, who have told us that they wish to participate in that briefing [the Bellwether Claims briefing]. The Committee reserves all rights with respect to the appropriateness of their participation."

Mr. Herrmann: "As for the preferred's participation, noted. I reserve all rights on the appropriateness of their participation. In addition, I request to participate in briefing, scheduling, chambers communications, and discovery for inter-company claims and substantive consolidation matters. To the extent those are being teed up, please let me know if there are any draft scheduling orders, draft motions, discussions, or other litigation plans on those issues."

Mr. Frishberg: "I also request the same rights that Mr. Herrmann does in regards to the preferred matters."

Source: Email to Chambers, dated 3/29/23, subject line "CEL // Claims Objection Response Deadline Extension"

Respectfully Signed,

Immanuel J. Herrmann
Pro Se
/s/ Immanuel J. Herrmann
April 15, 2023

Daniel A. Frishberg
Pro Se
/s/ Daniel A. Frishberg
April 15, 2023